

EXHIBIT 3

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UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH,)
individually and as Parent)
and legal guardian of ww, KW)
GW and LW, minor children of)
MATTHEW WADSWORTH,)

Plaintiffs,)

) Case No. _____

vs.) 2:23-cv-00118-NDF

)

WALMART, INC., and JETSON)
ELECTRIC BIKES, LLC)

Defendants,)

)

DEPOSITION OF BILL ROBINSON

Wednesday, November 15, 2023, 1:00 P.M.

Via Zoom video conference

BE IT REMEMBERED that the deposition of BILL ROBINSON was taken by the attorney for the Plaintiffs, GRAYSON GOODY, ESQ., 58 Malaga Cove Plaza, Palos Verdes Estates, California 90274 before Christine J. Roybal, Court Reporter for the State of Idaho, in the above-entitled matter.

1 telling him that you had just concluded your inspection and
2 investigation, did you provide him with any detail
3 whatsoever of the results of your investigation?

4 A. No.

5 Q. And so after that, he conducted his own inspection
6 and investigation?

7 A. That's correct.

8 Q. Do you know how long it took for him to conduct
9 his inspection and investigation?

10 A. They're more thorough than we are, as expected,
11 they are more diving in for origin and cause than we are,
12 which is typical. Very normal. And I want to say his took
13 pretty much the remainder of the day, maybe even some into
14 the evening, if I recall.

15 Q. Okay. Do you know approximately how many hours
16 that would have been?

17 A. I don't.

18 Q. Do you know how long your inspection and
19 investigation took?

20 A. Mine took just under two hours, roughly.

21 Q. Did you remain on the scene until he concluded his
22 inspection and investigation?

23 A. I don't recall if I remained the entire time he
24 was there, but I remained the majority of the time at least.

25 Q. After you greeted Detective Sheman and

1 entities.

2 Q. So looking at Exhibit 9, it shows your report was
3 completed February 9, 2022. After you left the scene on
4 February 1 of 2022, did you have any further investigative
5 activities after the day of the fire?

6 A. I don't recall if I popped back out there for a
7 thing or two or not. I think after I turned it over, it was
8 a while back, I don't remember, but once I -- common
9 practice, once we turn it over to the PD unit, this case
10 being the sheriff's unit, we don't touch the scene. We
11 don't try to go on there unless we're called again.

12 Q. Do you recall being called back to the scene in
13 this instance?

14 A. No.

15 Q. It looks like you did take some evidence from the
16 scene, correct?

17 A. I didn't personally take any of it from the scene.

18 Q. Looking at Exhibit 9, from the narrative 2, when
19 it says, "The evidence found on scene during the
20 investigation and any other findings were turned over to the
21 Sweetwater County Sheriff's Department."

22 Does that mean they took possession of it right away?

23 A. So when they show up, if we're going to turn -- in
24 this case, exactly. They showed up, I talked to them. When
25 he's going in to do his I turn it over to him. I'm already

1 evidence as it becomes available, correct?

2 A. That's correct.

3 Q. And if evidence becomes available, that may affect
4 your opinion, that opinion should be reassessed, correct?

5 A. Depending how the evidence became available,
6 correct.

7 Q. As new evidence comes to light you need to
8 consider that evidence, true?

9 A. Consider all evidence, correct.

10 Q. And as I understand it, you were on scene for
11 about two hours for your origin and cause -- or for your --
12 you didn't work just an origin investigation, correct?

13 A. Correct.

14 Q. Okay. You were on scene for about two hours for
15 your origin investigation, correct?

16 A. Roughly, correct.

17 Q. If the fire had started in the bedroom where you
18 believe it started, you would expect to see some arcing on
19 electrical wiring in that room, correct?

20 MR. AYALA: Form.

21 A. That's actually not 100 percent correct.

22 Q. (BY MR. LAFLAMME) You would not expect to see
23 any electrical arcing in that room?

24 A. Well, it depends on where the -- the fire, if it
25 started in the electrical box you could see some arcing.